

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Lazer Kraze, Inc.)	Case No: 14-14218-IT
)	
Plaintiff,)	
)	
-v-)	PLAINTIFF’S MOTION FOR
)	<u>PARITAL SUMMARY JUDGMENT</u>
)	
)	
Hughes Entertainment, Inc.)	
d/b/a Laser Craze)	
Defendant.)	

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Lazer Kraze, Inc. (“LKI”) respectfully moves this Court to grant partial summary judgment against Defendant Hughes Entertainment, Inc. (“Hughes”). There is no genuine dispute of material fact, and LKI is entitled to judgment as a matter of law that Hughes has infringed LKI’s registered, incontestable trademark LAZER KRAZE. The undisputed facts demonstrate that Hughes’ LASER CRAZE mark is likely to be confused with LKI’s LAZER KRAZE mark, and that LAZER KRAZE is an incontestable, registered trademark entitled to national exclusivity. Hughes provides no evidence to support its proffered defense. Accordingly, this case is ripe for summary judgment.

LKI’s motion is supported by the accompanying memorandum (including a Local Rule 56.1 Statement of Undisputed Material Facts), declarations and exhibits.

Date: November 11, 2015

Respectfully submitted,

/s/ Matthew A. Kane

Marc C. Laredo, BBO No. 543973
Mark D. Smith, BBO No. 542676
Matthew A. Kane, BBO No. 666981
Laredo & Smith, LLP
101 Federal Street, Suite 650
Boston, MA 02110
Tel: (617) 443-1100
Fax: (617) 443-1174
laredo@laredosmith.com
smith@laredosmith.com
kane@laredosmith.com

Thomas F. Hankinson
J. Michael Hurst
Keating Muething & Klekamp PLL
Suite 1400
One East Fourth Street
Cincinnati, OH 45202
Tel: (513) 579-6400
Fax: (513) 579-6457
mhurst@kmklaw.com
thankinson@kmklaw.com

Attorneys for Lazer Kraze, Inc.

LOCAL RULE 7.21(A)(2) CERTIFICATION

I hereby that counsel have conferred, and that the parties are unable to resolve or narrow the issues presented in their summary judgment filings.

/s/ Matthew A. Kane

Matthew A. Kane

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2015, I caused true and correct copies of the foregoing to be filed electronically using the court's CM/ECF system and to thereby be served upon all registered participants identified in the Notice of Electronic Filing in this matter on this date. This document is available for viewing and downloading on the CM/ECF system.

/s/ Matthew A. Kane
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